

EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

_____ SIOBHAN WALSH,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:13-cv-13064-RWZ
)	
TELTECH SYSTEMS, INC.,)	
)	
Defendant.)	
_____)	

DEPOSITION SUBPOENA DUCES TECUM PURSUANT TO RULES 30(a) and 45

**TO: Michael DiLorenzo
33 Pinehurst Street
Roslindale, MA 02131**

GREETINGS

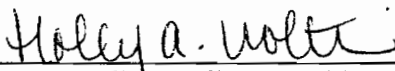
YOU ARE HEREBY COMMANDED, pursuant to Rules 30(a) and Rule 45 of the Federal Rules of Civil Procedure, to appear before a Notary Public of the Commonwealth of Massachusetts on **September 23, 2014** at the offices of O'Connor, Carnathan & Mack LLC, 1 Van De Graaff Drive, Suite 104, Burlington, Massachusetts 01803, and to testify as to your knowledge, at the taking of the deposition in the above entitled action.

AND YOU ARE FUTHER REQUIRED to produce the documents and things described in the attached **Schedule A** on or before **September 23, 2014**.

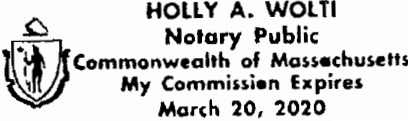
Hereof fail not as you will answer your default under the pains and penalties of the laws made and provided on that behalf.

QUESTIONS: CONTACT ATTORNEY SEAN CARNATHAN AT (781) 359-9000.

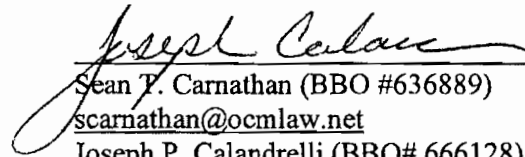
Dated: August 21, 2014



Notary Public- Holly A. Wolti
My Commission Expires: 3.20.20



TELTECH SYSTEMS, INC.,
By its attorneys,


Sean T. Carnathan (BBO #636889)
scarnathan@ocmlaw.net
Joseph P. Calandrelli (BBO# 666128)
jcalandrelli@ocmlaw.net
O'Connor, Carnathan and Mack LLC
1 Van De Graaff Drive, Suite 104
Burlington, Massachusetts 01803
Tel. 781-359-9000

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

1. The term “you” or “your” shall mean and refer to Michael DiLorenzo, and any person acting on his behalf.
2. The term “SpoofCard” or “SpoofCard product” shall mean and refer to the product manufactured by TelTech Systems, Inc.
3. “John Luciano” and “Melissa Luciano” are individuals who resided at 86 Granger St., Apt. 2L, Quincy, MA 02169 in or about January 2009.
4. Schedule A incorporates by reference the provisions of U.S. District Court for the District of Massachusetts Local Rule 26.5.
5. This Subpoena covers documents in your possession, custody, or control, including documents maintained at any of your present or former offices, at your attorney’s offices, or elsewhere.
6. This Subpoena shall be construed to include a demand for all notes and drafts (including electronic) of documents and communications within your possession or control.
7. Any words not defined above shall have the meaning given them by the Federal Rules of Civil Procedure.
8. Any document that is currently stored electronically shall be produced in an electronic format, retaining all metadata.
9. If you contend that any of the document requests seek the identification or production of a document that is protected from discovery by any privilege or immunity, please identify: (a) the date of its creation or transmittal; (b) the name of its author(s); (c) the name of the person(s) to whom it was addressed or sent; (d) the name of any persons to whom it was disclosed, in whole or in part; (e) a brief description of its subject matter; and (f) the nature of the claimed privilege.
10. Unless otherwise stated, this Subpoena seeks communications during the period commencing January 1, 2008 through and including the present date.

DOCUMENTS REQUESTED

1. All documents and communications concerning the civil litigation brought by John Luciano against you, Michael DiLorenzo, and Johnienne DiLorenzo in connection with the January 28, 2009 and February 2, 2009 phone calls made to Siobhan Walsh.
2. All documents and communications concerning all criminal charges brought against you and Johnienne DiLorenzo in connection with the January 28, 2009 and February 2, 2009 phone calls made to Siobhan Walsh.
3. All documents and communications concerning any other civil or criminal litigation arising out of the January 28, 2009 and February 2, 2009 phone calls made to Siobhan Walsh.
4. All communications between you and Siobhan Walsh between January 1, 2008 and the present.
5. All communications between you and Richard B. Reiling, Esq., Todd Pomerleau, Esq., and/or any other representative of Siobhan Walsh between January 1, 2008 and the present.
6. All communications between you and John Luciano between January 1, 2008 and the present.
7. All communications between you and Melissa Luciano between January 1, 2008 and the present.
8. All photographs and video recordings in any format, which include any image of John Luciano, Melissa Luciano, and/or Siobhan Walsh.
9. All phone records reflecting any calls between you and Siobhan Walsh, John Luciano, and/or Melissa Luciano between January 1, 2008 and the present.
10. All documents and communications concerning your purchase of and/or subscription to a SpoofCard product at any time.
11. All documents and communications, to the extent not already requested in Requests 1-10, concerning the January 28, 2009 and/or February 2, 2009 phone calls made to Siobhan Walsh.